

SMITH KATZENSTEIN
JENKINS LLP

September 13, 2024

Via CM/ECF

The Honorable Sherry R. Fallon
J. Caleb Boggs Federal Building
Unit 14, Room 6100
844 North King Street
Wilmington, DE 19801-3555

Re: *Chow v. Canyon Bridge Capital Management, LLC et al*, C.A. No. 22-947-JLH-SRF

Dear Judge Fallon:

Pursuant to Your Honor's July 23, 2024 Oral Order (D.I. 47), I write on behalf of Plaintiff Benjamin Bin Chow in the above-referenced matter to submit this proposed scheduling order (attached hereto as Exhibit 1) in advance of the Rule 16(b) teleconference scheduled for September 18, 2024. Counsel for Plaintiff shared the attached proposed scheduling order with counsel for Defendants (see email exchange attached hereto as Exhibit 2), but Defendants would not meet with Plaintiffs and did not respond until late this afternoon when they refused to agree with the proposed scheduling order and did not submit any counter-proposals.

Counsel for Plaintiff is available at the Court's convenience should Your Honor have any questions.

Respectfully submitted,

/s/ Daniel A. Taylor

Daniel A. Taylor (No. 6934)

cc: Counsel of record (via CM/ECF)